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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

11 ANTHONY PAN, an individual;
12 Plaintiff,
13 vs.
14 MASTER LOCK COMPANY, LLC., a
15 Delaware corporation;
16 Defendant.

Case No. 2:22-cv-08943-JLS-AS
**DEFENDANT MASTER LOCK
COMPANY LLC'S NOTICE OF
MOTION AND MOTION TO
DISMISS PLAINTIFF'S FIRST
AMENDED COMPLAINT**
[CLASS ACTION]

Date: May 12, 2023
Time: 10:30 a.m.
Ctrm: 8A, 8th Floor
Judge: Hon. Josephine L. Staton

Complaint filed: December 9, 2022
FAC filed: March 10, 2023

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on May 12, 2023, at 10:30 a.m., or as soon
3 thereafter as this matter may be heard in courtroom of the Honorable Josephine L. Staton
4 at the United States District for the Central District of California, Courtroom 8A, 8th Floor,
5 350 West 1st Street, Los Angeles, CA 90012, Defendant Master Lock Company LLC
6 (“Defendant”) will and hereby moves this Court for an order dismissing Plaintiff Anthony
7 Pan’s (“Plaintiff”) First Amended Complaint and each claim asserted therein.

8 This motion is made pursuant to Federal Rules of Civil Procedure 8, 9(b), 12(b)(1)
9 and (b)(6), and on the grounds that Plaintiff lacks standing under Article III of the United
10 States Constitution to pursue any of the claims alleged in his First Amended Complaint.
11 The grounds for the motion are more fully set forth in the Memorandum of Points and
12 Authorities, filed herewith.

13 This Motion is based on this Notice of Motion and Motion, the accompanying
14 Memorandum of Points and Authorities, all filings and pleadings in this action, and all
15 filings and on such other and further matters as the Court may consider.

16 This Motion is made following a conference of counsel pursuant to L.R. 7-3, which
17 took place by telephone on March 16, 2023.

19 DATED: March 24, 2023

FOLEY & LARDNER LLP
Jaikaran Singh
Kelsey Finn

23 */s/ Jaikaran Singh*

Jaikaran Singh
Attorneys for Defendant Master
Lock Company LLC